REMARKS

INTRODUCTION

In accordance with the foregoing, no claims have been amended. Claims 1-4 and 7-9 are pending and under consideration.

CLAIM REJECTIONS

Claims 1-4 and 7-9 were rejected under 35 USC 103(a) as being unpatentable over Nagai et al. (US 6,636,587) (hereinafter "Nagai") in view of Wood et al. (US 6,091,808) (hereinafter "Wood") and further in view of Kishinsky et al. (US 6,286,033) (hereinafter "Kishinsky").

Claims 1-4

Claim 1 recites: "...wherein the CTI control module comprises a CTI API (Application Programming Interface) including CTI control functions for the CTI board; and a working section for calling the CTI control functions in a given order from the CTI API and performing the basic telephone action in accordance with the main control module, the working section to control the interpretation module according to an input from the interpretation scenario management section..."

As noted in the Office Action, neither of Nagai and Wood discuss the feature of claim 1 where the CTI control module comprises a CTI API (Application Programming Interface) including CTI control functions for the CTI board. Instead, the Office Action relies on Kishinsky to show this feature of claim 1, and specifically relies on 4:38-4:39 of Kishinsky to show this feature.

In Kishinsky, a software driver for reading and writing XML descriptor-language describing object-oriented CTI scripts is provided. The software comprises, an XML writer for expressing object-oriented CTI scripts in the form of XML, an XML reader for interpreting object-oriented CTI scripts expressed in the form of XML, and an application-programming-interface for interfacing the software driver to an object-oriented-programming-system. The software driver creates and distributes an XML version of the object-oriented CTI script created by the object-oriented-programming-system, wherein the driver interprets a received XML version of the object-oriented CTI script, and in conjunction with the object-oriented programming system, generates the object-oriented CTI script. Kishinsky, 4:33-4:47.

As shown above, Kishinsky discusses software including an application-programming-interface for interfacing a software driver to an object-oriented-programming-system. By contrast, claim 1 recites that the **CTI control module comprises a CTI API** including CTI control functions for the CTI board.

Although Kishinsky does discuss an application-programming-interface for interfacing a software driver to an object-oriented-programming-system, this disclosure in Kishinsky does not obviate the structure recited in claim 1 of the CTI control module comprising a CTI API including CTI control functions for the CTI board.

To help clarify the features and advantages of this feature of claim 1, the following example is given using reference numerals from the specification as an example only. According to the present invention, when a talker 100 inputs the telephone number of the listener 300, the simultaneous interpretation system 500 calls the CTI control function dx_dial from the CTI API 533, generates a DTMF signal corresponding to the telephone number of the listener 300 through the CTI board 510, and attempts to connect the call. At this time, the CTI control functions to be executed later are determined according to whether the listener 300 can talk over the telephone. That is, if the tone signals are input from the telephone line of the listener 300 through the CTI board 510, the simultaneous interpretation system recognizes that the talker 100 can talk over the telephone, and then, calls ATDX_CPTERM as the following CTI control function and transmits ringing signals to the telephone of the listener 300. On the other hand, if a busy signal is input from the telephone line of the listener 300 through the CTI board 510, the simultaneous interpretation system recognizes that the listener 300 cannot talk over the telephone, and then, calls dx_play as the following control function and outputs a call connection failure message. That is, in order to perform the phone dialing action, the CTI control function, dx_dial, should be called and then the different CTI control functions should also be called in accordance with the signals input from the CTI board 510. In view of the foregoing, claim 1 recites a structure where the CTI control functions are configured as a work unit capable of performing the basic telephone actions and are then called in order through the working section 535 to perform the basic telephone actions. Specifically, claim 1 recites that the CTI control module comprises a CTI API including CTI control functions for the CTI board. As noted above, although the relied upon references may discuss variations of an API, they do not discuss the configuration recited in claim 1, which provides that the simultaneous interpretation system of the present invention controls all the operations associated with the interactive simultaneous interpretation services in accordance with the interpretation scenario in which the

actions to be performed at the next stages are defined beforehand. Therefore, the talker can freely speak by telephone with the listener who uses a different language and is remotely located.

Claims 2-4 depend on claim 1 and are therefore believed to be allowable for at least the foregoing reasons.

Withdrawal of the foregoing rejections is requested.

Claims 7-9

Claim 7 recites: "...wherein the CTI control module comprises a CTI API (Application Programming Interface) including CTI control functions for the CTI board; and a working section for calling the CTI control functions in a given order from the CTI API and performing the basic telephone action in accordance with the main control module..."

Similar to the argument for claim 1, it is respectfully submitted that the above-noted feature of claim 7 is not discussed in the any of the relied upon references, taken alone or in combination.

Claims 8 and 9 depend on claim 7 and are therefore believed to be allowable for at least the foregoing reasons.

Withdrawal of the foregoing rejections is requested.

CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.
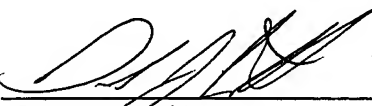
If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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